My name is Christopher Todd, and my call sign is AG4WX. I am an Extra Class amateur radio

operator, and I have been a licensed ham since 1998, however I have been involved in ham

radio through my family ever since my twin brother got licensed in 1991 at age 13.

I would like to offer some comments on RM-10620, the petition by Dale Reich, K8AD.

I am in partial disagreement with this petition, and likewise in partial agreement.

I do not believe that "years of operating service" should automatically upgrade an

amateur license holder to a higher class in the case of a Novice operator..

Years of service does not necessarily constitute adequate operating knowledge. If such a rule was ordered, Novice operators would become Technician w/HF licensees

By nature of the Novice license, even a Novice operator with 20 years experience would

have little experience in UHF/VHF operating (not to mention RF safety and other procedures)

since their license currently precludes them from such operation, save for the limited

 $222 \mathrm{MHz}$ band. I also see little reason to return 2-meter phone privileges to Novices, since

no new Novice licenses are being granted and obtaining an upgrade to Technician $\ensuremath{\text{w}/\text{HF}}$ to gain

full UHF/VHF privileges is quite simple.

In addition, although I do not have the facts in front of me, I find it hard to believe

that many Novice licensees that have not yet upgraded to Technician are still actually

active, participating operators in the Amateur service. I suggest the FCC look into the

renewal / expiration rate and the upgrade rate of Novice licensees when considering this

petition, in order to try and deign the level of activity within the Novice class. Although

it's only a guess, I believe that an investigation may find that most Novice licensees

are inactive.

I do, however, see little harm in upgrading an Advanced class licensee with 20 years

experience to an Extra class. Since today's Extra class exam is partly made of questions

from the older Advanced class exam, the degree of knowledge conferred by an Extra class

license today as compared to an experienced Advanced operator is negligible. I fully

agree with K8AD's petition in that experienced Advanced operators should be automatically $% \left(1\right) =\left(1\right) +\left(1\right) +$

upgraded to Extra class.